

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

LISA RICCOBENE)	
Plaintiff)	
)	
v.)	C.A. No. 04-10256-MEL
)	
MASSACHUSETTS BAY)	
TRANSPORTATION AUTHORITY)	
And)	
ANNE McCALL)	
Defendants)	
)	

JOINT MOTION TO EXTEND PRETRIAL SCHEDULE BY NINETYDAYS

The parties to this action, through counsel, hereby respectfully request that the Court extend the pretrial schedule in this case by ninety days.

Specifically, it is requested that the pretrial schedule be extended as follows:

1. Close of fact discovery-extended from August 16, 2005 through February 12, 2006.
2. Date for filing of summary judgment motions-extended from October 16, 2005 through April 12, 2006.
3. Date for filing opposition to summary judgment motions-extended from November 16, 2005 through May 11, 2006.

As grounds for this motion, the parties state that they are currently involved in discovery in this action, but that additional time is needed to finish discovery.

For all of the foregoing reasons, it is respectfully requested that this motion be granted, and the pretrial schedule in this case extended as set forth above.

Lisa Riccobene
By her attorney

/s/Mitchell J. Notis

Mitchell J. Notis
Law Office of Mitchell J. Notis
370 Washington Street
Brookline, MA 02445
617-566-2700
BBO# 374360

Massachusetts Bay Transportation Authority
Anne McCall
By their attorneys,

/s/Joseph L. Edwards, Jr.

Walter B. Prince (BBO#406640)
Joseph L. Edwards, Jr. (BBO#564288)
Prince, Lobel, Glovsky & Tye LLP
585 Commercial Street
Boston, MA 02109
617-456-8000